

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,

Plaintiff,

v.

ABDULLAHI MOHAMUD YUSUF,

Defendant.

) INFORMATION CR 15-46 MJD
)
) (18 U.S.C. § 2339B(a)(1))
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THE UNITED STATES ATTORNEY CHARGES THAT:

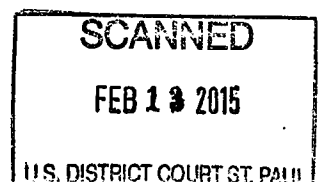
COUNT 1

(Conspiracy to Provide Material Support to
a Designated Foreign Terrorist Organization)

Beginning on or about March 1, 2014, and continuing until on or about June 1,
2014, within the State and District of Minnesota, and elsewhere, the defendant,

ABDULLAHI MOHAMUD YUSUF,

did unlawfully and knowingly conspire and agree with others both known and unknown to
provide material support and resources, as that term is defined in Title 18, United States
Code, Section 2339A(b)(1), including property, services and personnel, and financial
support, to a foreign terrorist organization, namely, *ISIL (Islamic State of Iraq and the
Levant)*, which the Secretary of State has designated as a foreign terrorist organization at
all times relevant to this Information, knowing that the organization was a designated



foreign terrorist organization, and knowing that *ISIL* has engaged, and engages, in terrorist activity and terrorism; all in violation of Title 18, United States Code, Section 2339B(a)(1).

Dated: 2/12/2015

ANDREW M. LUGER
United States Attorney

A handwritten signature in black ink, appearing to read "Andrew R. Winter", written in a cursive style.

BY: ANDREW R. WINTER
Assistant United States Attorney
JOHN DOCHERTY
Assistant United States Attorney